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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17 NATIONAL TPS ALLIANCE, *et al.*,

Case No. 3:25-cv-5687-TLT

18 Plaintiffs,

DEFENDANTS' EMERGENCY MOTION TO
SHORTEN TIME

19 v.

Judge: Hon. Trina L. Thompson

20 KRISTI NOEM, in her official capacity as
21 Secretary of Homeland Security, *et al.*,

22 Defendants.

1 Defendants have filed an emergency motion to stay the Court's July 31, 2025, order postponing
2 certain actions taken by Defendant Kristi Noem, Secretary of Homeland Security. ECF No. 73. Expedited
3 briefing is necessary because the Court's order prevents the Secretary's terminations of TPS for Honduras,
4 Nepal, and Nicaragua. *See Termination of the Designation of Honduras for [TPS]*, 90 Fed. Reg. 30,089
5 (July 8, 2025) (termination effective Sept. 8, 2025); *Termination of the Designation of Nepal for [TPS]*,
6 90 Fed. Reg. 24,151 (June 6, 2025) (termination effective August 5, 2025); *Termination of the Designation*
7 *of Nicaragua for [TPS]*, 90 Fed. Reg. 30,086 (July 8, 2025) (termination effective Sept. 8, 2025).
8 Specifically, Defendants request that the Court issue a decision on Defendants' motion for a stay pending
9 appeal no later than 12:01 p.m. PDT on August 8, 2025. If the Court does not grant Defendants' motion
10 by then, Defendants intend to move for a stay pending appeal of this Court's order (ECF No. 73) with the
11 United States Court of Appeals for the Ninth Circuit. *See* Fed. R. App. P. 8(a). Plaintiffs were notified
12 of this motion by email on August 1, 2025, and did not provide a position before filing; Defendants believe
13 that Plaintiffs are opposed to this motion and intend to file a response.
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1 Dated: August 1, 2025

Respectfully submitted,

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